

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SERGEI A. MOROSHKIN

22 CV 00864

Write the full name of each plaintiff.

____ CV ____
(Include case number if one has been assigned)

-against-

Rt. Rev. Andrew Dietsche

COMPLAINT

Do you want a jury trial?

☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

RECEIVED
SDNY PRO SE OFFICE
2022 FEB -1 PM 2:14

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ **Federal Question**

☐ **Diversity of Citizenship**

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

anti-retaliation provision, Civil Right Act of 1964
§ 704(a), 42 U.S.C.A. § 2000e-3(a)

B. If you checked Diversity of Citizenship**1. Citizenship of the parties**

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of _____
 (Plaintiff's name)

 (State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____

 If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of

If the defendant is a corporation:

The defendant, _____, is incorporated under the laws of
the State of _____

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

Sergei	A.	MOROSHKIN
First Name	Middle Initial	Last Name
865 Madison Avenue		
Street Address		
New York	NY	10021
County, City	State	Zip Code
347-640-0240		
Telephone Number	Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: Andrew Dietsehe
 First Name Last Name
Archbishop of episcopalian diocese of New York
 Current Job Title (or other identifying information)
1047 Amsterdam Avenue
 Current Work Address (or other address where defendant may be served)
New York NY 10025
 County, City State Zip Code

Defendant 2: _____
 First Name Last Name

 Current Job Title (or other identifying information)

 Current Work Address (or other address where defendant may be served)

 County, City State Zip Code

Defendant 3: _____
 First Name Last Name

 Current Job Title (or other identifying information)

 Current Work Address (or other address where defendant may be served)

 County, City State Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIMPlace(s) of occurrence: Trinity Church on Wall StreetDate(s) of occurrence: January 10, 2021**FACTS:**

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

Security guard named Louis secretly attacked me from the back by chemical spray used by military forces against active civilians in occupied territories to trace their movement and place of residence. This offense was conducted around afternoon on January 10, 2021 when I standing by the gate of the Trinity Church receiving sandwich (humanitarian help) from a female security guard. In the same day in the evening the black car came to my temporary residence and a person from the car loudly shouting to my landlord Lady: "Is Sergei living here?"

Application of said chemical (bioweapon) by the security guard of Trinity Church on Wall Street inflicted harm to my health (loss of my tooth, cardiac distress,

chronical pain in my back and left leg).

On 22 of January 2021 I complained to New York Supreme Court (Index No. 100051/2021) and on June 30, 2021 the case was dismissed, Appellate Court (Case No. 2021-02827) affirmed dismissal on January 13, 2022 pointed out that I failed to proof that a security guard acted in occupational capacity.

Trinity Church on Wall Street started retaliate me after I filed appellate complaint: they refused to get my brief and record of appeal on their address directed delivery of the documents to 28 Liberty Place to Federal Security agency which shut down my internet connection from December 2021.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

I see illegality and corruption of the security service of Trinity Church on Wall Street in using their personal connection with Federal Security agency to retaliate me for filing complaint against Trinity Church. I blame Andrew Dietsche for negligence-perse for allowing Trinity Church on Wall Street to have security service with police power caused damaging health and retaliation.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

I demand for relief of my health damages and retaliation \$10,000 amount paid by Andrew Dietsche,

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

<u>February 1, 2022</u>		<u>Sergei Moroshkin</u>	
Dated		Plaintiff's Signature	
<u>Sergei</u>	<u>A.</u>	<u>MOROSHKIN</u>	
First Name	Middle Initial	Last Name	
<u>865 Madison Avenue</u>			
Street Address			
<u>New York</u>	<u>NY</u>	<u>10021</u>	
County, City	State	Zip Code	
<u>347-640-0240</u>			
Telephone Number		Email Address (if available)	

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.